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April 7, 2015

VIA ECF AND EMAIL

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007

Re: *In re Zinc Antitrust Litigation*, No. 14 Civ. 3728 (KBF)

Dear Judge Forrest:

I write as Interim Co-Lead Counsel for Plaintiffs in the above-referenced matter. Plaintiffs respectfully request that the time for filing their consolidated amended complaint in the *Zinc* matter be extended thirty (30) days, until May 27, 2015.

In support of this request, Plaintiffs provide the following information under Rule 1.G.ii of the Court's Individual Rules of Practice in Civil Cases:

a. Original Due Date:

"Thirty (30) days after the Court has ruled on the second round of motions concerning Direct Purchaser Plaintiffs' [then] forthcoming proposed amended complaint in *Aluminum*." (April 27, 2015).

b. Proposed new due date:

May 27, 2015.

c. Previous requests:

One, by letter dated September 16, 2014 (ECF No. 77).

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d. Requests granted or denied:

Granted, by Court Order dated September 19, 2014 (ECF No. 78).

e. Whether Defendants consent:

With the exception of the LME Defendants,¹ all Defendants consent to this request for a modest extension of time to file the consolidated amended complaint.² Plaintiffs are continuing to confer with the LME Defendants regarding this request.

f. Brief explanation for request:

As of March 26, 2015, the Court “has ruled on the second round of motions concerning Direct Purchaser Plaintiffs’ [then] forthcoming proposed amended complaint in *Aluminum*.” Under the terms of the Court’s September 19 Order, the deadline for Plaintiffs to file their consolidated amended complaint in this matter is currently Monday April 27, 2015.

Plaintiffs respectfully request an additional thirty (30) days time, until May 27, 2015, to prepare and file their consolidated amended complaint. This modest extension is so that Plaintiffs may continue to develop their claims in light of the Court’s three recent opinions and orders in *Aluminum*.

Respectfully submitted,

KESSLER TOPAZ
MELTZER & CHECK, LLP



Kimberly A. Justice

KAJ/reg

cc: Counsel of Record

¹ The LME Defendants include: The London Metal Exchange (f/k/a The London Metal Exchange Limited), LME Holdings Limited, and Hong Kong Exchanges & Clearing, Ltd.

² With the agreement of counsel to plaintiff therein, this agreement also applies to the related action *Galvanizers Company v. London Metal Exchange Limited, et al.*, Case No. 14 Civ. 5066 (KBF).